Attachment No. 4

Photographic Log

Photographic Log

Burke-Parsons-Bowlby Corporation
Goshen Division
9223 Maury River Road
Post Office Box 86
Goshen, VA 24439

EPA ID No. VAD005027560

Date of Inspection: April 8, 2004

1. Manufacturing section of facility. Cut and plated ties being air dried before treatment.

2. Same as photograph 1, different area of manufacturing side.

3. Treatment section of facility. Creosote treated ties are stored in the storage yard. CCA treated lumber is stored under a roofed structure which can be viewed in the right side of photograph.

4. Drip pad and five treatment cylinders. The green cylinder, Treatment Cylinder No. 4, on the right is for CCA.

5. Same as photograph 4, further back from treatment cylinders. This photograph shows the rails imbedded in the drip pad in addition to the pad's rough texture. The entire surface of the drip pad was covered with dried creosote residue.

6. Close-up of creosote build-up on pad.

7. Same as photograph 6, different area of pad.

8. Same as photograph 6, different area of pad.

9. Apron of drip pad where treated lumber is placed before being transferred to the storage yard.

10. A crack in the drip pad that has been filled and sealed.

11. Incidental drippage of creosote on apron of drip pad. This section of the drip pad is not protected from the environment (i.e., precipitation) by the metal roof.

12. Hazardous waste accumulation area. At the time of the inspection there was a total of seventeen 55-gallon drums being stored in this location. The drum located in front of the fenced in area was a satellite accumulation drum containing drip pad sweepings. All of

the drums were in good condition, closed and labeled with the words "Hazardous Waste." However, one of the full 55-gallon drums (not the satellite container) was not marked with an accumulation start date.

13. Close-up of "Hazardous Waste" label on the full 55-gallon drum in the hazardous waste accumulation area that was not marked with an accumulation start date.

14. Wood bin, located next to hazardous waste accumulation area, containing plant trash. The bin contained creosote contaminated gloves and hose, in addition to used aerosol cans. The gloves and hose can been seen in this photograph.

15. Same as photograph 14, different angle. The used aerosol cans can be viewed in this photograph.

16. Satellite accumulation drum for CCA filter bags. The drum was in good condition, closed and labeled "Hazardous Waste."

17. Containers of used oil were located throughout the facility, this photograph was taken at the Bridge Timber Mill. The used oil is recycled at the facility by mixing it in with the creosote for treatment.

18. Same as photograph 17, this container was located outside of the maintenance shop.

19. Universal waste lamp storage area. At the time of the inspection, the facility had two boxes containing used fluorescent bulbs. Both of the boxes were open and labeled "Universal Waste."

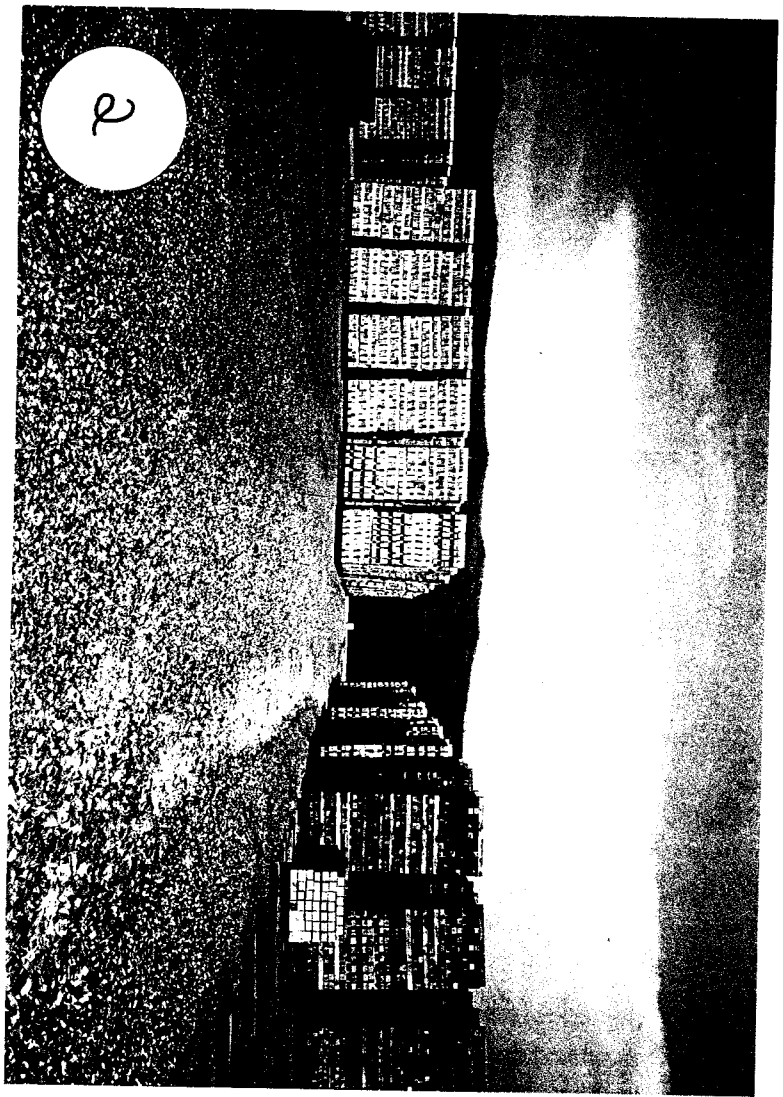
20. Incidental drippage of creosote observed in the storage yard.

21. Section of land where plant waste had been buried in the past.

22. Sump in front of creosote cylinder

23. Sump in front of CCA cylinder


1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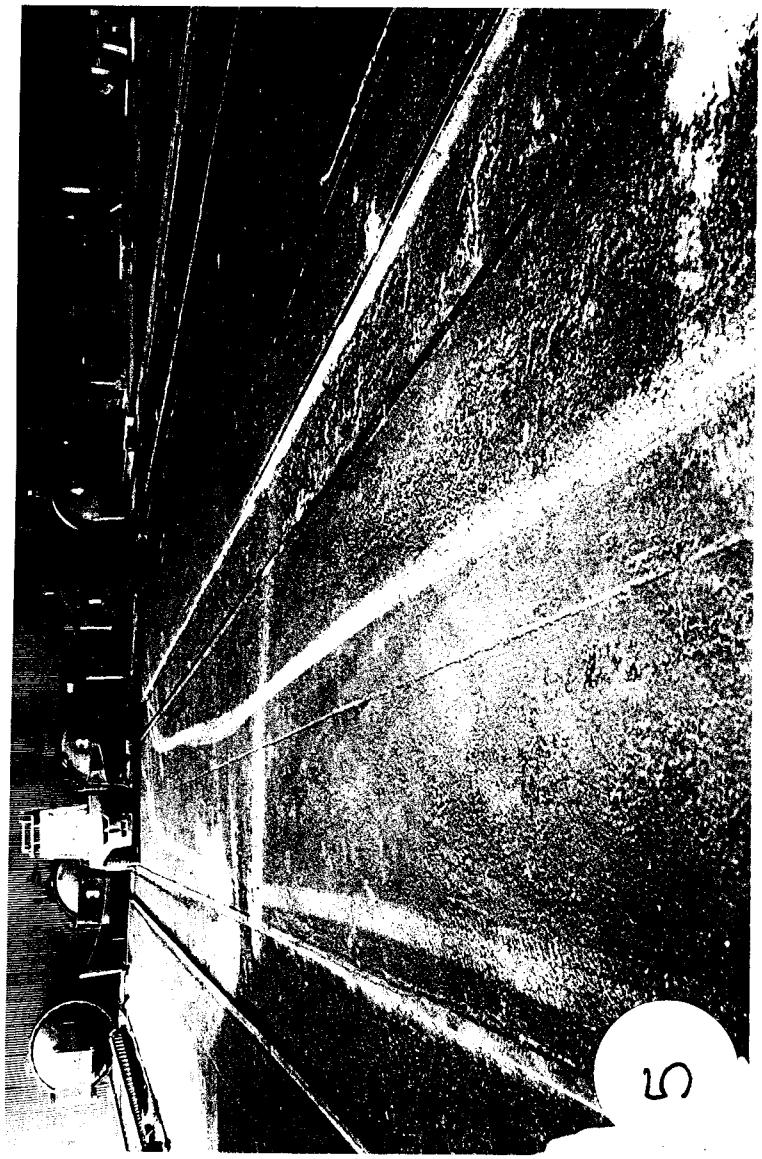
4
4 834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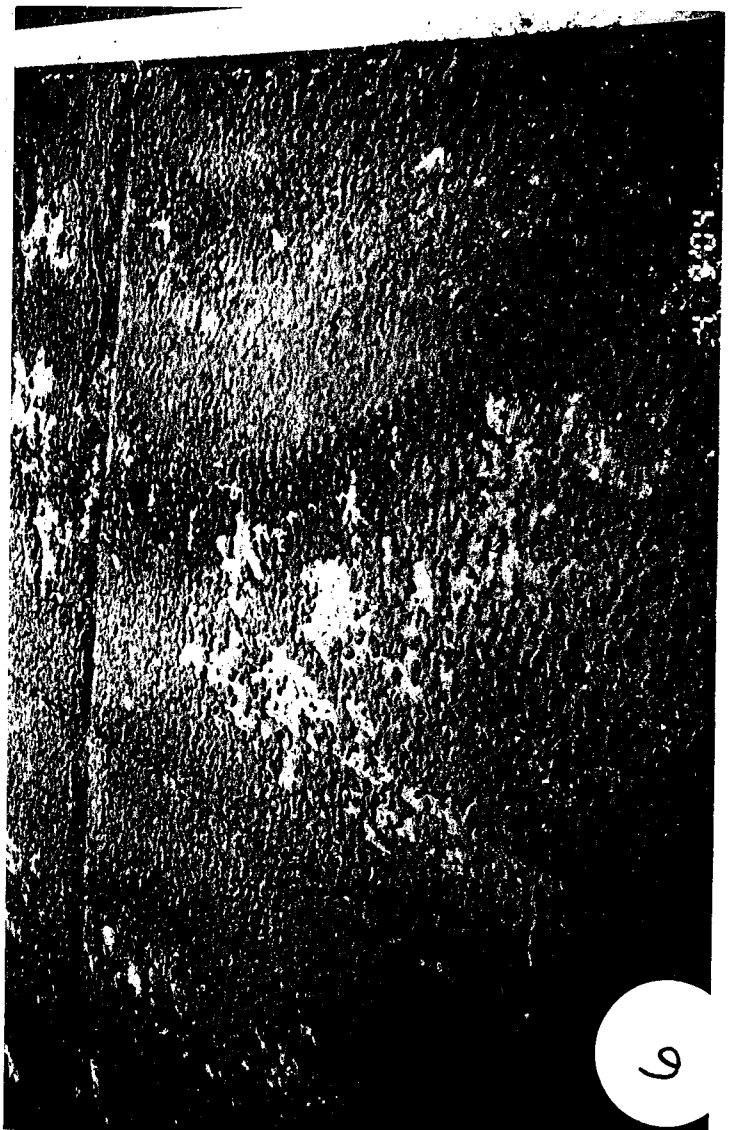
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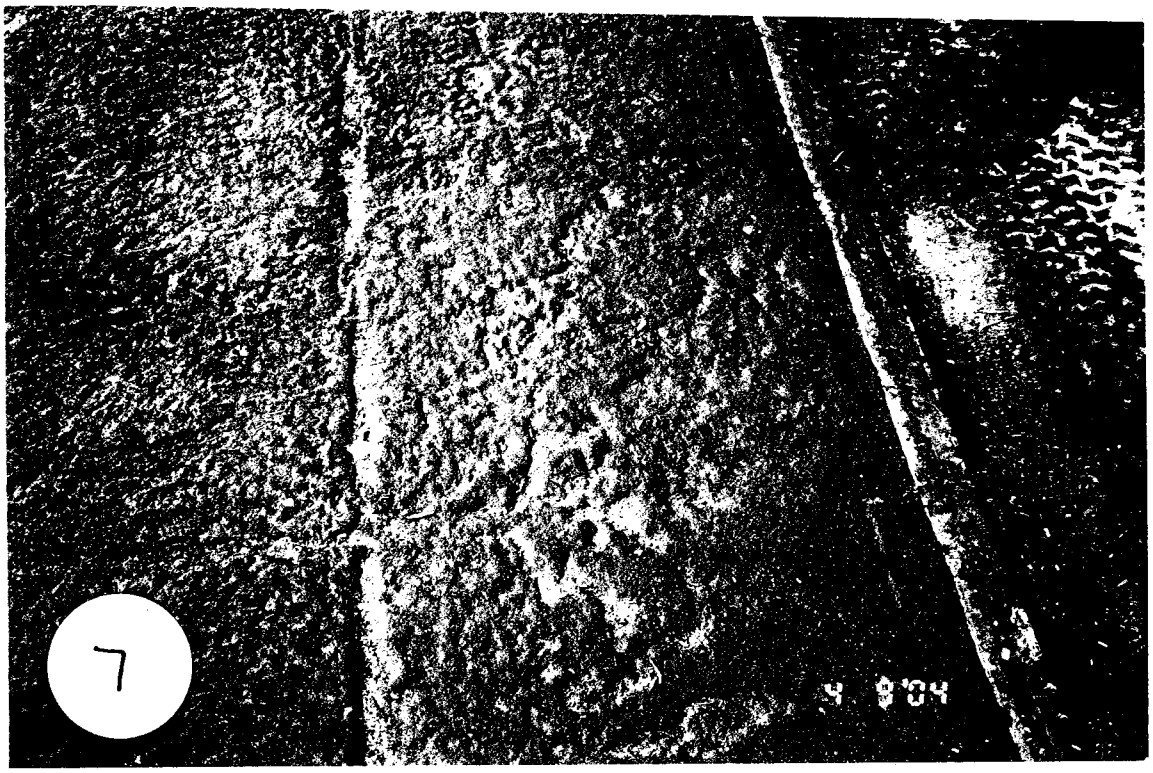
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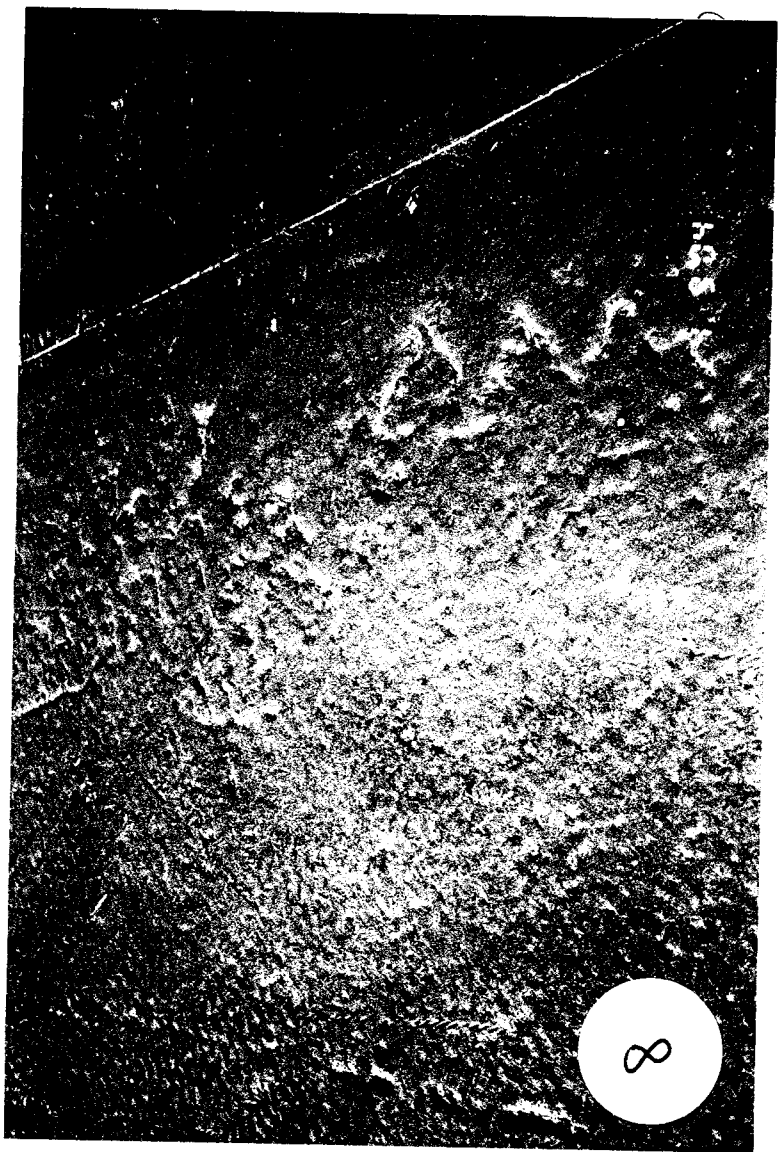
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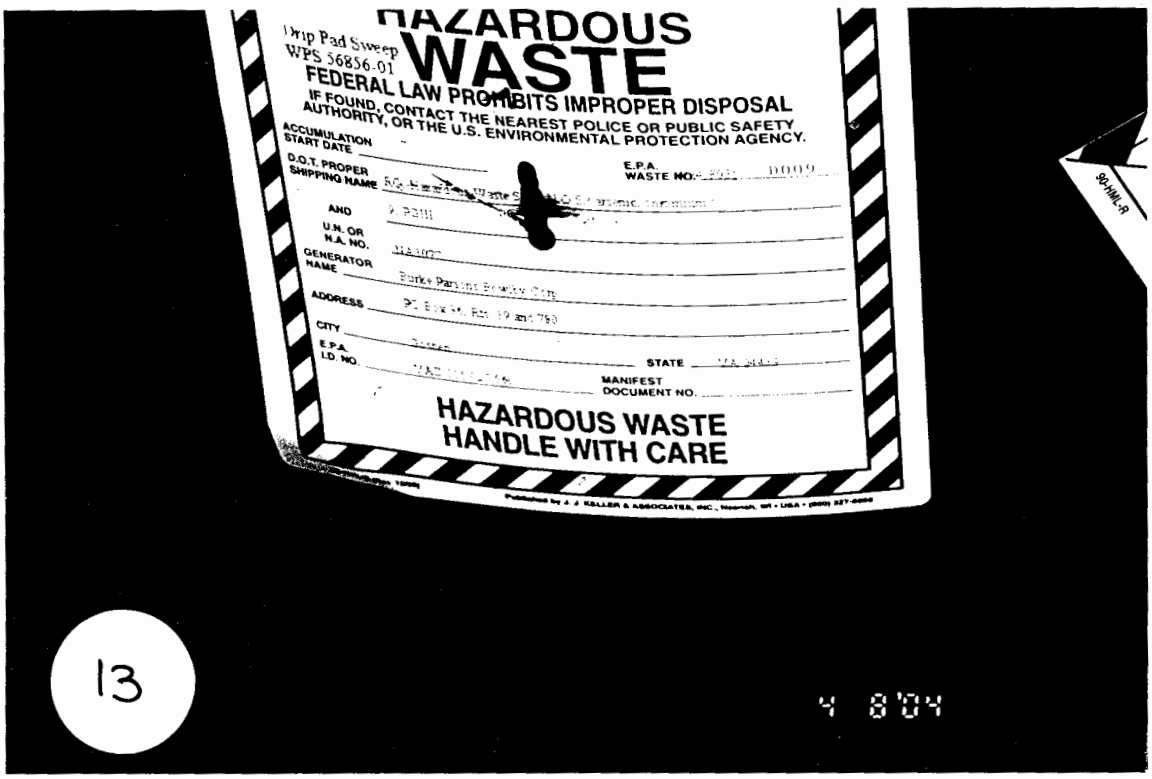
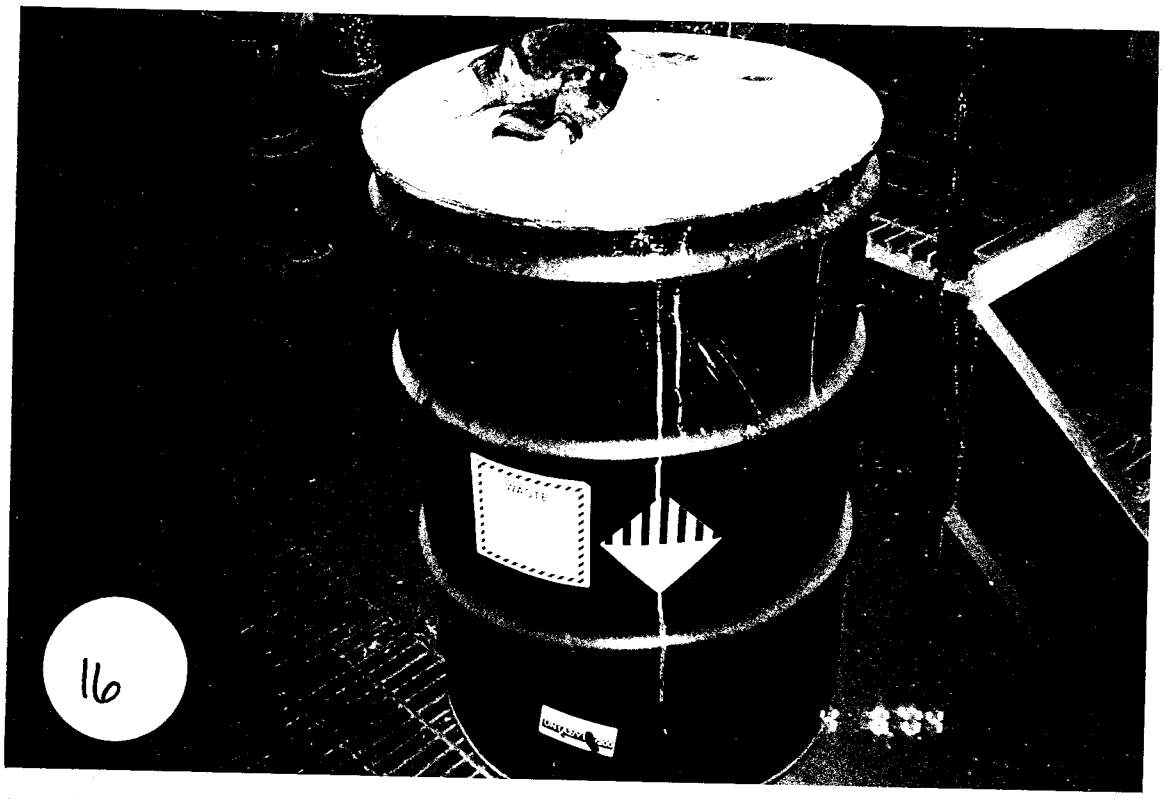

Drip Pad Sweep
WPS 56856-01
HAZARDOUS
WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.
ACCUMULATION START DATE
D.O.T. PROPER SHIPPING NAME
E.P.A. WASTE NO.
AND
U.N. OR N.A. NO.
GENERATOR NAME
ADDRESS
CITY
E.P.A. I.D. NO.
STATE
MANIFEST DOCUMENT NO.
HAZARDOUS WASTE
HANDLE WITH CARE
49 HMCR
13
4 804


E


D


16

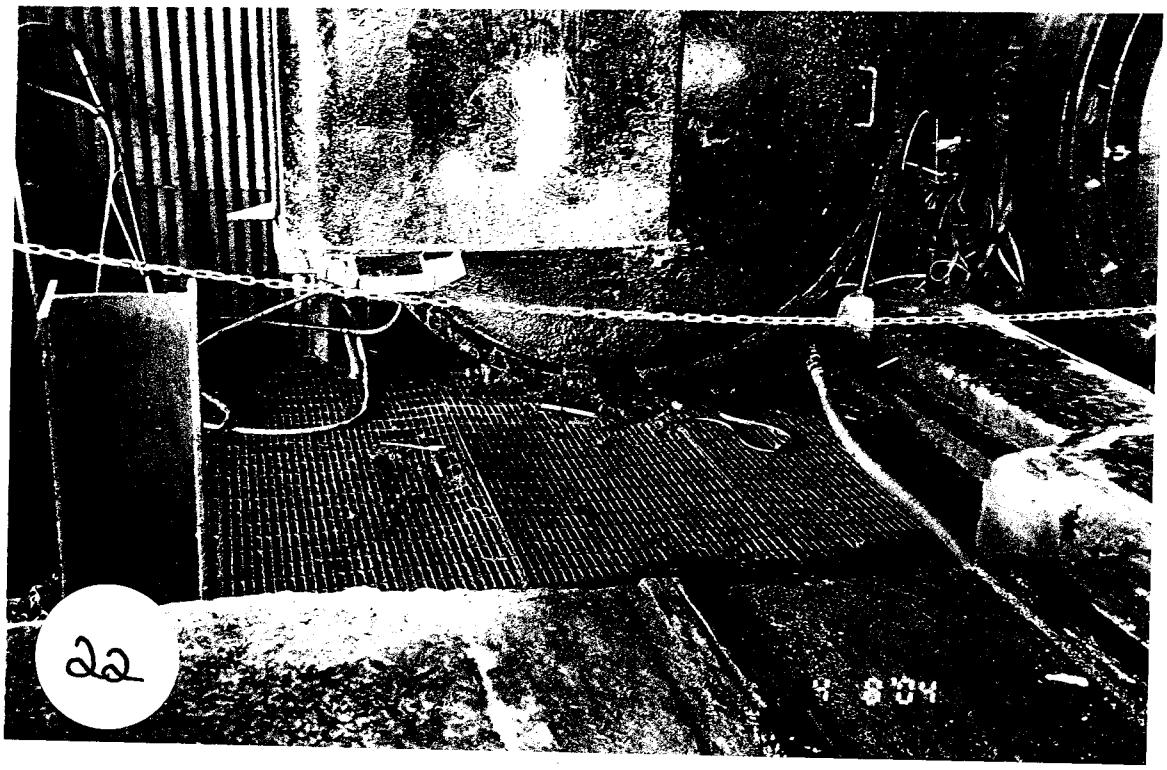

17

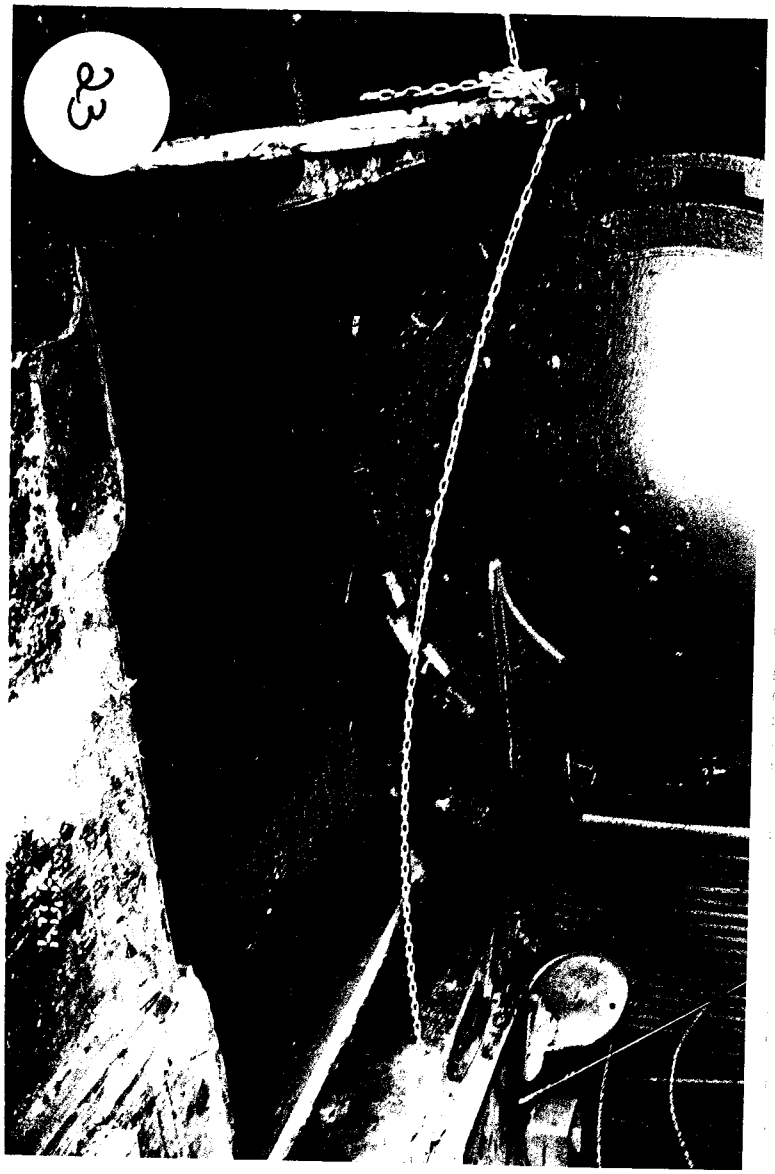

18


UNIVERSAL
WASTE
DANGER
GE Lighting
Fluorescent Lamps
19


20


21





(23) Kenneth J. Cox

Attachment No. 5

Subpart W (Drip Pad) Checklist

Date Thursday, April 8, 2004
Inspector Serena Henry
Facility ID # VAD005022560

SUBPART W (DRIP PAD) CHECKLIST

Section A - Design Requirements	YES	NO
1. Is the drip pad constructed of non-earthen materials excluding wood and non-structurally supported asphalt? [265.443(a)(1)]	↘	
2. Is the drip pad sloped to free-drain treated wood drippage, rain and other waters, or solutions of drippage and water or other wastes to the associated collection system? [265.443(a)(2)]	↘	
3. Does the drip pad have a curb or a berm around the perimeter? [265.443(a)(3)] covered w/ a metal roof		↘
4. Has the drip pad been evaluated to determine that it meets the requirements of paragraphs (a) through (f) of 265.443?	↘	
If yes, has the owner/operator obtained a statement from an independent, qualified registered PE certifying that the drip pad design meets the requirements of this section? [265.443(g)]	↘	

Section B - Sealed Drip Pads	YES	NO
1. Is the drip pad an existing pad or has the owner or operator elected to comply with 265.442(a)(4) instead of 265.442(b)?	↘	
If no, skip to Section C.		
2. Is the entire surface of the drip pad where drippage occurs or may run across sealed, coated or covered with a surface material that has a hydraulic conductivity of less than or equal to 1×10^{-7} centimeters per second? [265.443(a)(4)(i)]	↘	
3. Is the drip pad maintained free of cracks and gaps that could adversely affect its hydraulic conductivity? [265.443(a)(4)(i)]	↘	
4. Is the material used to seal the drip pad chemically compatible with the preservatives that contact the pad? [265.443(a)(4)(i)]	↘	

→ no cracks or gaps were observed, however, the pad was covered w/ a build-up of creosote
see report

Date Thursday, April 8, 2004
Inspector Seanna Henry
Facility ID # VAD005027560

	YES	NO
5. Does the owner or operator have on file at the facility a written assessment of the integrity of the drip pad, reviewed & certified by a registered PE that attests to the results of the evaluation? [265.443(a)(4)(ii)]	↘	___
If yes, is the assessment reviewed, updated and recertified annually?	↘	___
6. Does the evaluation document the extent to which the drip pad meets the design and operating standards of this section, except for subsection (b) which applies to pads with liner/leak detection? [265.443(a)(4)(ii)]	↘	___
7. Is the drip pad of sufficient structural strength and thickness to prevent failure due to physical contact, climatic conditions, stress of installation and stress of daily operations, e.g., vehicle traffic and movement of wood? [265.443(a)(5)]	↘	___

Section C - Lined Drip Pads N/A - Existing Pad

1. If the owner/operator elects to comply with 265.443(b) instead of 265.443(a)(4), Does the drip pad have a synthetic liner installed below the drip pad.	___	___
2. Is the liner designed, constructed and installed to prevent leakage from the pad into adjacent subsurface soil, groundwater or surface water at any time during the active life including closure period of the drip pad? [265.443(b)(1)]	___	___
3. Is the liner constructed of materials that have appropriate chemical properties and sufficient structural strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation and stress of daily operations, e.g., vehicle traffic on the pad? [265.443(b)(1)(i)]	___	___
4. Is the liner placed on a foundation or base capable of providing support to the liner and resistance to pressure gradients above and below the liner to prevent failure of the liner due to settlement, compression or uplift? [265.443(b)(1)(ii)]	___	___

Date _____
Inspector _____
Facility ID # _____

	YES	NO
5. Is the liner installed to cover all surrounding earth that could come in contact with waste or leakage? [265.443(b)(1)(iii)]	____	____

Section D - Leakage Detection System N/A

1. Does the drip pad have a leakage detection system that is immediately above the liner?	____	____
2. Is the leakage detection system designed, constructed, maintained and operated to detect leakage for the pad? [265.443(b)(2)]	____	____
3. Is the leakage detection system constructed of materials that are:		
Chemically resistant to the waste managed in the drip pad and the leakage that might be generated? [265.443(b)(2)(i)(A)]	____	____
Of sufficient strength and thickness to prevent collapse under the pressures exerted by overlaying materials and by equipment used on the drip pad? [265.443(b)(2)(i)(B)]	____	____
4. Is the leakage detection system designed and operated to function without clogging through the scheduled closure of the drip pad? [265.443(b)(2)(ii)]	____	____
5. Is the leakage detection system designed so that it will detect the failure of the drip pad or the presence of a release of hazardous waste or accumulated liquid at the earliest practicable time? [265.443(b)(2)(iii)]	____	____

Section E - Leakage Collection System N/A

Leakage Collection System applies only to drip pads installed after December 24, 1992.

1. Does the drip pad have a leakage collection system immediately above the liner? [265.443(b)(3)]	____	____
2. Is the leakage collection system designed, constructed, maintained and operated to collect leakage for the pad such that it can be removed from below the drip pad? [265.443(b)(3)]	____	____

Date _____
Inspector _____
Facility ID # _____

	YES	NO
3. Is the date, time and quantity of any leakage collected and removed from this system documented in the operating log? [265.443(b)(3)]	____	____
4. Is the drip pad maintained such that it remains free of cracks, gaps, corrosion or other deterioration that could cause hazardous waste to be released from the pad? [265.443(c)]	____	____
5. Is the drip pad and associated collection system designed and operated to convey, drain and collect liquid resulting from drippage or precipitation in order to prevent run-off? [265.443(d)]	____	____

Section F - Run-On & Run-Off Control

1. Is the drip pad protected by a structure as described in 265.440(b)? If yes, skip to Section G.	↘	____
2. If not protected by a structure as described in 265.440(b), has the owner/operator designed, constructed, operated and maintained a run-on control system capable of preventing flow onto the drip pad during peak discharge of a 24-hour 25-year storm? [265.443(e)]	____	____
3. Does the system have sufficient excess capacity to contain any run-on that might enter the system to collect and control at least the water volume resulting from a 24-hour 25-year storm? [265.443(e)]	____	____
4. If not protected by a structure as described in 265.440(b), has the owner/operator designed, constructed, operated and maintained a run-off management system to collect and control at least the water volume resulting from a 25-year storm? [265.443(f)]	____	____

Section G - Operation

1. Has the drippage and accumulated precipitation been removed from the associated collection system as necessary to prevent overflow onto the drip pad? [265.443(g)]	↘	____

Date _____
Inspector _____
Facility ID # _____

	YES	NO	
2. Is the drip pad surface cleaned thoroughly in a manner and frequency such that accumulated residues of hazardous waste or other materials are removed so as to allow weekly inspections of the entire drip pad surface without interference or hindrance from accumulated residues of hazardous waste and other materials? [265.443(i)]	___	↘	- entire drip pad was covered w/ dried creosote residue - cleaned thoroughly on a yearly basis
If yes, has the owner/operator documented the date and time of each cleaning? [265.443(i)]	↘	___	(sweep pad)
Is the cleaning procedure used described in the facility's operating log? [265.443(i)]	did not ask		
3. Is the drip pad operated and maintained in a manner to minimize tracking of hazardous waste or hazardous waste constituents off the drip pad as a result of activities by personnel or equipment? [265.443(j)]	↘	___	
4. After being removed from the treatment vessel, is treated wood from pressure and non-pressure processes being held on the drip pad until drippage has ceased. [265.443(k)]	↘	___	
If yes, has the owner/operator maintained records sufficient to document that all treated wood is held on the pad following treatment?	↘	___	
5. Are the collection and holding units associated with run-on and run-off control systems emptied or otherwise managed as soon as possible after storms to maintain design capacity of the system? [265.443(l)]	↘	___	
6. Has the owner/operator maintained as part of the facility operating log documentation of past operating and waste handling practices? [265.443(n)]	___	___	
If yes, does it include:			
a. preservative formulations used in the past?	did not ask		
b. description of drippage management practices?	↓	↓	
c. description of treated wood storage and handling practices?	↓	↓	

Date _____
Inspector _____
Facility ID # _____

	YES	NO
Section H - Release of Hazardous Waste		
1. Throughout the active life of the drip pad, has the owner/operator detected a condition that may have caused or has caused a release of hazardous waste? [265.443(m)]	____	____
If no, skip to Section I.		
2. Has the condition been repaired within a reasonably prompt period of time following discovery? [265.443(m)]	____	____
Upon detection of a condition that may have caused or has caused a release of hazardous waste, did the following occur;		
3. Has a record of the discovery been entered in the facility operating log? [265.443(m)(1)(i)]	____	____
4. Was the portion of the drip pad affected by the condition immediately removed from service? [265.443(m)(1)(ii)]	____	____
5. Has the steps for repair of the drip pad been determined, any leakage been removed from below the drip pad and a schedule for clean up and repair been established? [265.443(m)(1)(iii)]	____	____
6. Within 24 hours after discovery of the condition, was the Regional Administrator notified and with in 10 working days was a written notice provided to the Regional Administrator with a description of the steps that will be taken to repair the drip pad, clean up any leakage and the schedule for accomplishing this work? [265.443(m)(1)(iv)]	____	____
7. Upon completing all repairs and clean up, has the owner/operator notified the Regional Administrator in writing and provided a certification, signed by an independent, qualified, registered PE, that the repairs and clean up have been completed in accordance with the written plan submitted in accordance with paragraph 265.443(m)(1)(iv)? [265.443(m)(3)]	____	____

Date _____
Inspector _____
Facility ID # _____

	YES	NO
Section I - Record Keeping		
1. During construction or installation, was the liner and cover system e.g., membranes, sheets or coatings inspected for uniformity, damage and imperfections e.g., holes, cracks, thin spots or foreign materials? [265.444(a)]	N/A	
2. Immediately after construction or installation, was the liner inspected and certified as meeting the requirements of 265.443 by an independent, qualified, registered PE? [265.444(a)]	N/A	
If yes, is the certification maintained at the facility as part of the facility operating record? [265.444(a)]	N/A	
3. Was the liner and cover inspected after installation to ensure tight seams and joints, and the absence of tears, punctures or blisters? [265.444(a)]	N/A	
4. Is a contingency plan maintained that describes how an owner/operator will respond immediately to incidental drippage or kickback in the storage yard? [265.440(c)(1)]	↘	
Has the facility completed the following:		
a. clean up of drippage/kickback within 72 hours of the incident not discovery	↘	
b. documented the clean up of drippage/kickback	↘	
c. retained documentation for three years	↘	
d. managed the contaminated media in accordance with federal regulations	↘	
5. Has the facility inspected the drip pad weekly and after storms? [265.444(b)]	↘	
If yes did the facility check for the following:		
a. deterioration, malfunctions or improper operation of run-on and run-off control systems? [265.444(b)(1)]	↘	
b. the presence of leakage in and proper functioning of leakage detection system? [265.444(b)(2)]	N/A	
c. deterioration or cracking of the drip pad surface? [265.444(b)(3)]	↘	

Date _____
Inspector _____
Facility ID # _____

	YES	NO
6. Are procedures described in the facility operation log that will be followed to ensure that all wastes are removed from the drip pad and associated collection system at least once every 90 days? [262.34(a)(1)(iii)(A)]	↘	
7. Is each waste removal, including the quantity of waste removed from the drip pad and the collection system and date and time of removal documented? [262.34(a)(1)(iii)(B)]	↘	

Attachment No. 6

10/30/01 Manifest

Emergency Contact Telephone Number
800-560-2374

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VAD005027560 | Manifest Document No. 01-004 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Burke Parsons Bowlby Corporation
P. O. Box 86, Goshen, VA 24439

4. Generator's Phone (540 997-9281 ATTN: Joe Burton

A. State Manifest Document Number

B. State Generator's ID SAME

5. Transporter 1 Company Name: Freehold Cartage, Inc. | 6. US EPA ID Number: NJD054126164

C. State Transporter's ID

D. Transporter's Phone 732-462-1001

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Ross Incineration Services, Inc
38790 Giles Road
Grafton, OH 44044 | 10. US EPA ID Number: OHD048415865

G. State Facility's ID

H. Facility's Phone 440-748-2171

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X RQ Hazardous Waste Solid, N.O.S. (arsenic, chromium) 9, NA3077, PGIII, (F034,F035)	4	DM	1800	P	F034
b.	X RQ Hazardous Waste Solid, N.O.S. (arsenic, chromium), 9, NA3077, PGIII, (F035)	0	DM	0	P	F035
c.	X RQ Hazardous Waste solid, N. O.S. (arsenic chromium), 9, NA3077, PGIII, (F035)	1	DM	450	P	F035
d.	X RQ Hazardous Waste solid, N.O.S. (creosote) 9, NA3077, PGIII (F034)	20	DM	9000	P	F034

J. Additional Descriptions for Materials Listed Above
A. WPS 56856-01 drip pad sweepings, also F035, ERG#171
B. WPS 56859-01 CCA sludge ERG# 171
C. WPS 56857- 01CCA filter bags, ERG#171
D. WPS 56858-01 creosote ERG# 171

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Emergency Contact: Capitol Environmental Services, Inc. 800-560-2374
CESI Job# ROAN-TFORT-1346-2091

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Joseph R. Burton | Signature | Month 10 | Day 30 | Year 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month | Day | Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month | Day | Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month | Day | Year

EPA

GENERATOR'S COPY

BLS-C6
(Rev. 10/96)

P.O. BOX 5010 • FREEHOLD, NJ 07728-5010
(732) 462-1001 • FAX (732) 308-0924

175 BARTOW MUN. AIRPORT
BARTOW, FL 33830
PHONE:(941) 533-4599
FAX:(941) 533-1613

108 MONAHAN AVENUE
DUNMORE, PA 18512
PHONE:(570) 342-7232
FAX:(570) 342-7367

350 PIGEON POINT ROAD
NEW CASTLE, DE 19720
PHONE:(302) 658-2005
FAX:(302) 658-6229

156 DRIFTWOOD DRIVE
EUTAWVILLE, SC 29048
PHONE/FAX:(803) 492-9595

MANIFEST

FCI EPA ID NO.:
NJD054126164

K 41160

GENERATOR NAME/ADDRESS	PHONE	GENERATOR EPA ID NO.
[illegible]	(AREA CODE) [illegible]	[illegible]
	TRACTOR: [illegible] TRAILER: [illegible]	APPOINTMENT TIME: :

FCI REP. LOADING (PRINT)	PROCEDURE	BOX SPOTTED	BOX REMOVED	TIME AT GENERATOR (MILITARY TIME ONLY)
[illegible]	[illegible]			11:30 ARRIVAL TIME / 12:30 DEPARTURE TIME

COMMENTS OR DELAYS AT GENERATOR	EQUIPMENT USED

BROKER: [illegible]

PO#: WO#:

STATE MANIFEST NO.: 01-004

(X) HM		PROPER U.S. D.O.T. SHIPPING NAME	U.S. D.O.T. HAZARDOUS CLASS	NA/UN/NO.	PACKING GROUP	NO. CONT.	CONT. TYPE	NET QUANTITY	UNIT MEASURE	WASTE NO	FORM
	1	[illegible]				25	DM	11501F			
	2	01-004									
	3										

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (I.E., IDENTIFICATION SHIPMENT OF A NON-HAZARDOUS NATURE WHICH DOES NOT HAVE TO BE MANIFESTED).

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transported named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge

Payment to the contractor for waste removal does not constitute payment to the carrier and if the contractor does not pay the carrier, the generator is obligated to pay the agreed rate offered to the contractor.

PLEASE PRINT NAME/TITLE	GENERATOR'S SIGNATURE	DATE LOADED
[illegible]	X [illegible] I HAVE READ THE ABOVE AND UNDERSTAND AND AGREE TO ALL OF ITS CONTENT.	11 / 30 / 01 MO. DAY YR.

TSDF NAME/ADDRESS	PHONE	TSDF EPA ID NO.
[illegible]	(AREA CODE)	
	TRACTOR: TRAILER:	APPOINTMENT TIME: :

FCI REP. UNLOADING (PRINT)	PROCEDURE	BOX SPOTTED	BOX REMOVED	TIME AT TSDF (MILITARY TIME ONLY)
				: ARRIVAL TIME / : DEPARTURE TIME

COMMENTS OR DELAYS AT TSDF	EQUIPMENT USED

PLEASE PRINT NAME/TITLE	TSDF SIGNATURE	DATE UNLOADED
	X	/ / MO. DAY YR.

AR H-0257 PC 944	ME ME-HWT-47 ME-WOT-47	MO H-1490	NOVA SCOTIA, CANADA NSC 000 147	QUEBEC, CANADA QC-6ML-047
CT CT-HW-307	MD HWH-167 96-OP-1765	ND WH-429	OH UPW-0190713-OH	RI RI-535
DE DE-HW-203 DE-SW-203	MA MA-294	NH TNH-0047	OK 3358	TX 40705
IL SWH-1540	MN 61572	NJ S-2265 15939	ONTARIO, CANADA A 840943	WI 11602
		NY NJ-113	PA PA-AH-0067	

White - FCI Original
Yellow - FCI Billing
Blue - FCI Office/Customer
Green - Retained by TSDF
Gold - Retained by Generator

K 41160

NOTIFICATON OF WASTE SUBJECT
TO LAND DISPOSAL RESTRICTIONS

Page 1 OF
Revised 11/98

Generator BURKE PARSONS BOWLBY CORP.
Address RT 39 AND RT 780
P.O. BOX 86
COSDEN 24439

Manifest #
Shipper #
U.S. EPA ID# VAD005027560

1. The generator named above hereby provides the following NOTIFICATION to Ross Incineration Services, Inc. (RIS) as required by 40 CFR 268.7(a)(1) and the OAC3745-59-07(A)(1). The waste material shipped under the above Manifest Document Number is subject to Land Disposal Restriction regulations as set forth in 40 CFR 268 Subpart D/OAC3745-59.

2. Check all UNDERLYING HAZARDOUS CONSTITUENTS (UHC's), on the attached form, which can reasonably be expected to be present in the waste at a concentration above the constituent specific treatment standard listed in 40 CFR Part 268.48, Table UTS - Universal Treatment Standards. UHC's must be identified for D001 (if not treated by CMBST or RORGS), D002, D003 (except reactive cyanides and unexploded ordnance subcategories), D004-D011 (specific subcategories) and D012-D043. Wastewater forms of D012-D017 do not require that UHC's be identified.

   Check all F001-F005 REGULATED HAZARDOUS CONSTITUENTS (RHC'S) which can be reasonably expected to be present in this waste at a concentration above the constituent specific treatment standard listed in 40 CFR Part 268.48.

3. A separate page must be used for each WPS in which RHC's or UHC's are present.

4. Waste Analysis is attached where available, otherwise, the information contained herein is based upon my thorough knowledge of the waste(s).

UNDERLYING HAZARDOUS CONSTITUENTS

Aldicarb sulfone	HxCDDs(All Hexachlorodibenzo-p-dioxins)	Physostigmine	
Barban	HxCDFs(All Hexachlorodibenzofurans)	Physostigmine salicylate	
Butylate	3-Iodo-2-propynyl n-butylcarbamate	Promecarb	
Carbofuran phenol	Methiocarb	Propham	
Carbosulfan	Methomyl	Prosulfocarb	
m-Cumenyl methylcarbamate	Metolcarb	TCDDs(All Tetrachlorodibenzo-p-dioxins)	
Cycloate	Mexacarbate	TCDFs(All Tetrachlorodibenzofurans)	
EPTC	Molinate	Thiophanate-methyl	
Formetanate hydrochloride	Oxamyl	Triethylamine	
	Pebulate	tris-(2,3-Dibromopropyl) phosphate	
	PeCDDs(All Pentachlorodibenzo-p-dioxins)	Vernolate	
	PeCDFs(All Pentachlorodibenzofurans)	Mercury-NWW from Retort	

(X) THE ABOVE UNDERLYING HAZARDOUS CONSTITUENTS ARE NOT "REASONABLY EXPECTED" TO BE PRESENT IN THE WASTE PRODUCT SURVEYS LISTED IN WASTES SUBJECT TO TREATMENT.

ROSS INCINERATION SERVICES, INC. CANNOT ACCEPT WASTE WITH THESE UNDERLYING HAZARDOUS CONSTITUENTS WITHOUT SPECIAL APPROVALS. PLEASE CONTACT YOUR ACCOUNT REPRESENTATIVE IF APPROVALS ARE NEEDED.

WASTES SUBJECT TO TREATMENT
Nonwastewater(NWW) Wastewater(WW)

WPS #	Treatability Group	EPA Codes & Subcategory(if applicable)	Are UHC's or RHC's present?
5685601	NWW	F034 F035	
5685701	NWW	F035	
5685801	NWW	F034	
5685901	NWW	F035	

Signature Joseph R. Burton Date 10-30-01

Name Joseph R. Burton Title Safety Manager

It is the generator's responsibility under 40 CFR 268/OAC3745-59 to ensure that appropriate notifications accompany each shipment of waste as required. RIS makes no representations as to the accuracy of this form and recommends that the generator independently verify notification requirements for the waste streams.

POTENTIAL HAZARDS

FIRE OR EXPLOSION

- Some may burn but none ignite readily.
- Those substances designated with a "P" may polymerize explosively when heated or involved in a fire.
- Containers may explode when heated.
- Some may be transported hot.

HEALTH

- Inhalation of material may be harmful.
- Contact may cause burns to skin and eyes.
- Inhalation of Asbestos dust may have a damaging effect on the lungs.
- Fire may produce irritating, corrosive and/or toxic gases.
- Runoff from fire control may cause pollution.

PUBLIC SAFETY

- **CALL Emergency Response Telephone Number on Shipping Paper first. If Shipping Paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.**
- Isolate spill or leak area immediately for at least 10 to 25 meters (30 to 80 feet) in all directions.
- Keep unauthorized personnel away.
- Stay upwind.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing will only provide limited protection.

EVACUATION

Fire

- If tank, rail car or tank truck is involved in a fire, ISOLATE for 800 meters (1/2 mile) in all directions; also consider initial evacuation for 800 meters (1/2 mile) in all directions.

EMERGENCY RESPONSE

FIRE

Small Fires

- Dry chemical, CO_2, water spray or regular foam.

Large Fires

- Water spray, fog or regular foam.
- Move containers from fire area if you can do it without risk.
- Do not scatter spilled material with high pressure water streams.
- Dike fire-control water for later disposal.

Fire involving Tanks

- Cool containers with flooding quantities of water until well after fire is out.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks engulfed in fire.

SPILL OR LEAK

- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- Prevent dust cloud.
- Avoid inhalation of asbestos dust.

Small Dry Spills

- With clean shovel place material into clean, dry container and cover loosely; move containers from spill area.

Small Spills

- Take up with sand or other noncombustible absorbent material and place into containers for later disposal.

Large Spills

- Dike far ahead of liquid spill for later disposal.
- Cover powder spill with plastic sheet or tarp to minimize spreading.
- Prevent entry into waterways, sewers, basements or confined areas.

FIRST AID

- Move victim to fresh air.
- Call 911 or emergency medical service.
- Apply artificial respiration if victim is not breathing.
- Administer oxygen if breathing is difficult.
- Remove and isolate contaminated clothing and shoes.
- In case of contact with substance, immediately flush skin or eyes with running water for at least 20 minutes.
- Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

CERTIFICATE OF TREATMENT

GENERATOR INFORMATION

BURKE PARSONS BOWLBY CORP.
GOSHEN VA
EPA # VAD005027560

DATE RECEIVED..... 11/01/01

SHIPPER NUMBER..... 0097221

MANIFEST NUMBER..... 01004

PROCESSED AS OF..... 12/31/01

M-50

The above material has been processed at:

Ross Incineration Services, Inc.
36790 Giles Road
Grafton, Ohio 44044-9752
(440) 748-2171

US EPA ID # OHD048415665

Attachment No. 7

New Employee Safety Indoctrination Form

The BURKE-PARSONS-BOWLBY CORPORATION

NEW EMPLOYEE SAFETY INDOCTRINATION FORM

NAME:_____ DEPARTMENT ASSIGNED: _____

DATE:_____

BPB's SAFETY PROGRAMS:

INT.

_____ HAZARD COMMUNICATION; (Right to Know) HAZMAT/WASTE,MSDS,LABELING
_____ PPE GEAR; HARD HATS, SAFETY BOOTS, EYE PROTECTION, GLOVES, ETC.
_____ RESPIRATORS; INSPECTION, CARE, FIT TEST, STORAGE
_____ LOCKOUT/TAGOUT & MACHINE GUARDING; PROCEDURES & RESPONSIBILITIES
_____ CONFINED SPACE ENTRY; PROCEDURES & RESPONSIBILITIES
_____ FORKLIFT SAFETY; BASIC RULES, LOADING, UNLOADING,
_____ ELECTRICAL & TOOL SAFETY; INSPECTION, HAZARDS
_____ FIRE SAFETY/WELDING & HOTWORK;
_____ HEARING CONSERVATION & EYE PROTECTION;
_____ WALKWAYS, STAIRWAYS & WORK AREAS, GENERAL HOUSE KEEPING
_____ SPILL RESPONSE; EMERGENCY & PROCEDURES
_____ BACK PROTECTION, LIFTING
_____ BLOODBORNE PATHOGENS TRAINING; FIRST AID,CPR
_____ EMERGENCY EVACUATION; PROCEDURES, MEETING PLACE
_____ ACCIDENT/INCIDENT REPORTING PROCEDURES; LIGHT DUTY PROGRAM, MUST BE TAKEN TO DOCTOR, REPORT ALL ACCIDENTS TO YOUR SUPERVISOR.

_____ DATE:_____ WATCH/REVIEW OSHA WOOD TREATING TRAINING FILM

BPB's BENEFIT PROGRAMS:

_____ ESOP;
_____ SAFETY BOOT BONUS;
_____ SAFETY & PRODUCTION IDEA AWARD IMPROVEMENT PROGRAM:
_____ SAFETY BANQUET / NATIONAL SAFETY AWARD / PRESIDENTS TROPHY
_____ BENEFITS OF WORKING SAFELY AND NO LOST HOURS/TIME

BPB's POLICIES & PHILOSOPHIES:

_____ EMPLOYEES AGREEMENT (HANDBOOK)
_____ NO SMOKING IN YARD (DESIGNATED AREAS ONLY)
_____ ALCOHOL AND DRUGS (NOT PERMITTED)
_____ E.O.E. / A.D.A. / AFFIRMATIVE ACTION
_____ TEAM WORK / COMMUNICATION
_____ PRODUCTION, SAFETY & QUALITY CONTROL - WORKING TOGETHER
_____ COMPANY GOALS; PRODUCTION, SAFETY, EMPLOYEES

RETURN IN ONE WEEK FOR RE-INTERVIEW: DATE _____

_____ _____

(NEW EMPLOYEES SIGNATURE) (SAFETY MANAGER)